

**COMMITTEE ON DENTAL AUXILIARIES**

# **STRATEGIC PLAN**

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## **COMMITTEE ON DENTAL AUXILIARIES (COMDA) STRATEGIC PLAN**

The Committee on Dental Auxiliaries, hereinafter referred to as **ACOMDA®**, has adopted this Strategic Plan so that resources and focus can be directed at fulfilling its mission of protecting consumers and assuring access to quality dental care by all Californians in a cost-effective manner. COMDA views its Plan as a "living" guide for the subsequent five years, which will be re-evaluated annually.

### **MISSION STATEMENT**

The mission of the Committee on Dental Auxiliaries (COMDA) is to protect the public health, safety, and welfare through the examination of dental auxiliary professionals, and by promoting their full utilization in order to meet the dental care needs of all the state's citizens, under the direction of the Dental Board of California.

### **PRINCIPLES**

COMDA embraces the following principles:

- ! All of California's citizens should have access to quality dental care to preserve and restore their health.
- ! Full utilization of dental auxiliaries significantly assists in increasing access to quality dental care.
- ! Full utilization of dental auxiliaries is assisted by the existence of an accessible, viable career ladder.
- ! State agencies must be flexible, responsive, cost-effective, and the least intrusive possible consistent with the public health, safety, and welfare.

### **VISION**

COMDA's vision is to be a flexible, responsive, and cost-effective agency dedicated to assuring the highest level of consumer protection possible, without undue restrictions on the dental community, and to assuring access to quality dental care by all Californians through the full utilization of dental auxiliaries.

### **ORGANIZATIONAL OVERVIEW**

In creating the Committee on Dental Auxiliaries (COMDA) in 1974, the Legislature intended to permit the full utilization of dental auxiliaries in order to meet the dental care needs of all the state's citizens. Full utilization of auxiliaries is realized when all possible duties are delegated to auxiliaries, consistent with the protection of the public health and safety, so that services are accessible to as many Californians as possible.

The Legislature also mandated that a career ladder be established, permitting the continual advancement of auxiliaries without repeating training for skills already acquired.

In addition, the Committee is statutorily charged with qualifying, examining, and licensing dental auxiliaries for the Dental Board of California.

The Committee is comprised of nine members appointed by the Governor. It has a staff of nine (9) and an annual budget of about \$1.2 million. Currently, approximately 44,000 auxiliaries are licensed in California.

Annually, the Committee (1) administers 3,500 written examinations and 4,200 hands-on practical and clinical examinations; (2) issues about 3,000 new licenses; (3) processes the renewals of 21,000 licenses; and (4) evaluates new and existing RDA educational programs. The following five categories of dental auxiliaries are licensed and regulated:

- ! Registered Dental Assistants (RDA-s)
- ! Registered Dental Assistants in Extended Functions (RDAEF-s)
- ! Registered Dental Hygienists (RDH-s)
- ! Registered Dental Hygienists in Extended Functions (RDHEF-s)
- ! Registered Dental Hygienists in Alternative Practice (RDHAP-s)

In 1996 and 1997, the necessity for and effectiveness of COMDA was evaluated by the Department of Consumer Affairs and the Joint Legislative Sunset Review Committee under California's ASunset@laws. The resulting recommendation in early 1997 was that COMDA be retained, and that the duties historically delegated to it by the Dental Board of California be placed into statute, which became effective January 1, 1998.

In developing its Plan, COMDA gathered information from staff and from its major stakeholders and customers, which are:

Dental Consumers  
Licensees  
Applicants  
Professional Organizations  
Dental Educational Community  
Federal and State Governmental Agencies  
Dental-Related Industries

This assessment resulted in identification of the following opportunities for improvement during the next five years:

**California Dental Consumers want:**

- quality dental care
- access to quality dental care
- license status information
- quality customer service

**Licensees want:**

- ability to practice without unduly restrictive regulations
- ability to practice in alternative settings
- vigorous enforcement of unlicensed activity
- rapid resolution of patient complaints
- expansion of scopes of practice
- quality customer service

**Applicants want:**

- examinations that are valid and reliable measures of competence.
- readily available educational programs
- continuous testing
- freedom of movement (interstate practice)
- less stressful examinations
- shortened notification time of examination results
- quality customer service

**Professional Organizations want:**

- a forum to express their views/exchange ideas
- speedy resolution of issues
- to maintain the integrity of the dental health profession
- quality customer service

**Dental Education Community wants:**

- timely licensure of graduates
- feedback on state examination results

- clearly defined standards for licensure
- test development input
- a forum to express their views/exchange ideas
- speedy resolution of issues
- quality school approval/accreditation service
- quality customer service

**Federal and State Governmental Agencies want:**

- an accurate and accessible repository of licensee information
- a forum to express their views/exchange ideas
- quality customer service

**Dental-Related Industries want:**

- an accurate and accessible repository of licensee information
- quality customer service

<b>KEY GOALS</b>
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COMDA intends to focus its efforts and resources on achieving the following goals in order to accomplish its Mission and Vision:

- #1 Support the imposition of the least restrictive form of regulation necessary without compromising the public health, safety, or welfare.
- #2 Administer accessible, fair, and valid examination and licensing processes.
- #3 Assist the Board in its consumer protection and enforcement efforts.
- #4 Foster the accessibility of dental health care by supporting scopes of practice and supervision levels which allow the most effective utilization of dental auxiliaries.
- #5 Foster the accessibility of dental health care by supporting and advocating the existence of an accessible and viable career ladder which allows the most effective utilization of dental auxiliaries.
- #6 Support efforts to educate consumers in order to improve their dental health.
- #7 Develop and maintain the most flexible, responsive, and cost-effective organizational structure possible.

**Goal #1**

**SUPPORT THE IMPOSITION OF THE LEAST RESTRICTIVE FORM OF  
REGULATION NECESSARY WITHOUT COMPROMISING THE HEALTH, SAFETY,  
OR WELFARE OF THE PUBLIC.**

**Objective #1: Assure that the educational, experience, and examination requirements for each license category are necessary and, if so, appropriate in content and length, by June 30, 2001.**

**Performance Measure(s):**

a. Analysis completed and action taken to effect any necessary changes in the educational, experience, and examination requirements for each license category.

**Indicator(s) of Goal Achievement:**

a. Consensus among regulators, licensees, applicants, and other stakeholders that recommended changes reflect the results of the completed analysis.

**History of Goal Achievement/Revision:**

COMDA has committed significant resources to reviewing the examination, educational, and experience requirements, including the following:

a. Recommended that the RDA Practical Exam be eliminated, which resulted in November, 1998, direction from the Board that the exam be revised to increase its validity, that the experience requirement be reduced from 18 months to 12 months, and that pre-licensure training in certain areas be required. The RDA Practical Examination Subcommittee was directed by COMDA to study these issues and how to implement certain changes, and will make its recommendations to COMDA in March, 2000.

b. Recommended in 1998 that legislation be pursued to allow out-of-state experience as qualifying experience for RDA licensure applicants, a change that became effective January 1, 2000.

c. Conducted an occupational analysis of RDH's and began efforts to relate the results of that analysis to validation of the RDH clinical and written examinations. It is anticipated that a validation study will be presented to COMDA in late calendar year 2000. There is no "experience" requirements for RDH's, and the necessity of the "educational" requirement has not been explored.

d. Conducted an occupational analysis of EF's and began efforts to relate the results of that analysis to validation of the EF clinical examination. It is anticipated that a validation study will be presented to COMDA in late calendar year 2000. There is no "experience" requirements for EF's, and the necessity of the "educational" requirement has not been explored.

**Action Plan to Continue Goal Achievement:**

a. By June 30, 2000, survey applicable employers, educators, practitioners, applicants, professional groups, other state regulatory agencies, and consumers to determine their perspectives. With regard to the educational and examination requirements for EF's and RDH's, determine what action needs to be taken once the examination validation studies have been completed and COMDA's Task Force on the Review of DA, RDA, and EF Duties has submitted its recommendations.

**Objective #2: Assure that the mechanisms to ensure that new and previously-**



**approved educational programs meet the requirements for initial or continued approval are necessary and adequate to protect the public, by June 30, 2001.**

**Performance Measure(s):**

a. Analysis completed and action taken to effect any necessary changes in the educational program requirements and approval process.

**Indicator(s) of Goal Achievement:**

- a. Consensus among regulators, licensees, applicants, and other stakeholders that recommended changes reflect the results of the completed analysis.
- b. Increased examination scores for RDA candidates graduating from approved schools.

**History of Goal Achievement/Revision:**

Over three years ago, COMDA developed extensive revised proposed regulations governing RDA educational programs, which would impose requirements that are clear, concise, and protective of the public. Technical difficulties with the rationale for portions of the regulations resulted in withdrawal of the regulations from OAL twice, the last time in 1998.

**Action Plan to Continue Goal Achievement:**

- a. By December 31, 2000, re-submit regulations to OAL clearly defining the approval and operational requirements for RDA educational programs.
- b. By December 31, 2000, survey educators, graduates, professional groups, and other state regulatory agencies to determine their perspectives with regard to additional ways in which RDA educational program oversight efforts can be improved.
- c. By June 30, 2001, hold a public hearing to solicit additional testimony.
- d. By December 31, 2001, analyze collected data and make appropriate recommendations to the Dental Board of California.

**Objective #3. Assure that the continuing education requirement is the most appropriate mechanism to ensure continued competency, by June 30, 2004.**

**Performance Measure(s):**

a. Analysis completed and action taken to effect any necessary changes in the continuing education requirements.

**Indicator(s) of Goal Achievement:**

a. Consensus among regulators, licensees, applicants, and other stakeholders that recommended changes reflect the results of the completed analysis.

**History of Goal Achievement/Revision:**

In 1999, COMDA staff worked with Board staff to identify the methods by which licensee compliance with the continuing education requirements could be reported to the Board by CE

providers and monitored electronically. The second phase of the study is expected to begin in late FY99-00.

**Action Plan to Continue Goal Achievement:**

- a. By June 30, 2002, survey applicable employers, educators, practitioners, applicants, professional groups, other state regulatory agencies, and consumers to determine their perspectives.
- b. By June 30, 2003, complete research on alternative modes of assuring continued competence and hold a public hearing to solicit additional testimony.
- c. By December 31, 2003, analyze collected data and make appropriate recommendations to the Dental Board of California.

**Objective #4. Conduct a formal review of laws and regulations to ensure they are not unduly restrictive, or present artificial barriers, and that they continue to protect consumers, by June 30, 2002.**

**Performance Measure(s):**

- a. Analysis completed and action taken to effect any necessary changes in the laws and regulations governing auxiliaries.

**Indicator(s) of Goal Achievement:**

- a. Consensus among regulators, licensees, applicants, and other stakeholders that recommended changes reflect the results of the completed analysis.

**History of Goal Achievement/Revision:**

COMDA has consistently, on an on-going basis, worked to identify laws and regulations which are unduly restrictive, present artificial barriers to licensure, or fail to properly protect consumers.

These efforts are documented in other areas of the Plan related to specific subject-area goals.

**Action Plan to Continue Goal Achievement:**

- a. By December 31, 2000, survey employers, educators, applicants, practitioners, professional groups, and other state regulatory agencies to determine their perspectives.
- b. By June 30, 2001, hold a public hearing to solicit additional testimony.
- c. By December 31, 2001, analyze collected data and make appropriate recommendations to the Dental Board of California.

**Goal #2**

**ADMINISTER ACCESSIBLE, FAIR, AND VALID EXAMINATION AND LICENSING PROCESSES.**

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**Objective #1: Assure that the application forms require only information and documents legally required, and are easy to understand, complete, and file, by December 31, 2000.**

**Performance Measure(s):**

a. Analysis completed and action taken to effect any necessary changes in the application forms.

**Indicator of Goal Achievement:**

- a. Applicants indicate high levels of satisfaction with the ease of understanding, completing and filing application forms.
- b. Decrease in the number of applications rejected for incompleteness.

**History of Goal Achievement/Revision:**

In 1998, the RDA application instructions were altered to make them easier to understand, and less overwhelming in terms of information (applicants now receive a set of instructions with their application regarding completion of the application, and a separate set of instructions about the actual content of the examination when their applications are accepted). It has been determined that forms require only information and documents that are legally required.

To make the process even simpler, instructions began to be revised in early 2000 for the transition to a computerized written exam, whereby applicants will apply to COMDA for both the practical and written exams, instead of sending a separate application to DANB, which currently administers the written exam.

RDH and EF application instructions were also significantly altered in 1998 and 1999 to make them easier to understand, and it has been determined that the forms require only documents and information that are legally required.

Applicants began to be surveyed early in FY97-98, and have been surveyed during every examination cycle since, indicating a very high satisfaction level. Among the various categories, from 92% to 99% found instructions easy to understand.

**Action Plan to Continue Goal Achievement:**

- a. By March 31, 2000, determine the number of applications which were rejected as incomplete during 1999, analyze whether changes to the application forms and/or process would decrease the number of rejected applications, and make appropriate changes and/or recommendations.
- b. By September 30, 2000, analyze collected data, make appropriate process revisions, and make appropriate recommendations to the Dental Board of California if regulatory or statutory changes are necessary.
- c. By December 31, 2001, implement a system whereby applicants can file applications electronically.

**Objective #2: Assure that the length of filing periods and processing periods**

**assure the most timely access by applicants to licensure as possible, by December 31, 2000.**

**Performance Measure(s):**

a. Analysis completed and action taken to effect any necessary changes in the application and/or licensing processes.

**Indicator of Goal Achievement:**

- a. Applicants indicate high levels of satisfaction with the length of filing periods and processing periods.
- b. Decrease in the time between examination and issuance of (1) examination results; and (2) actual licenses.

**History of Goal Achievement/Revision:**

Surveys of candidates which began in early 1997-98 indicate high levels of candidate satisfaction with the length of the filing period (among the various categories, from 88% to 98% felt the open filing period to be of sufficient length).

In FY97-98, COMDA finalized and maximized implementation of the Applicant Tracking System so that applicants receive the most timely notice of examination and licensure possible.

Beginning with the March, 1999, exam, RDA scheduling notices were sent 3-1/2 to 4 weeks prior to the exams rather than 7 to 10 days.

Examination results in calendar year 1999 were issued to RDA candidates within 8 days after the last exam (compared to 7 in 1998), to RDH candidates within 21 days (compared to 21 in 1998), and to EF candidates within 3 (compared to 14 in 1998).

Historically, results of each examination have been withheld from candidates until the last examination in a cycle has been completed, so that candidates are not motivated to demand that they be allowed to take the first exam in each cycle, which is obviously not possible. Staff is exploring ways in which to issue results after each exam, while avoiding such candidate demands.

Ultimately, however, a major obstacle to the timely issuance of actual licenses, as opposed to examination results, are the DOJ and FBI fingerprint clearance requirements. Recent changes have resulted in a maximum of 60 days delay between the date of the examination and issuance of licenses to particular candidates. Recent exploration into electronic fingerprinting may reduce these timeframes.

**Action Plan to Continue Goal Achievement:**

- a. By June 30, 2000, analyze internal processes to determine methods by which the time periods can be reduced.
- b. By September 30, 2000, analyze collected data, make appropriate process revisions, and make appropriate recommendations to the Dental Board of California if regulatory or statutory changes are necessary

**Objective #3: Assure that the dates and locations of exams provide the most timely access by applicants possible, by December 31, 2002.**

**Performance Measure(s):**

- a. Analysis completed and action taken to effect any necessary changes in frequency and location of examinations.

**Indicator(s) of Goal Achievement:**

- a. Applicants indicate high levels of satisfaction with the frequency and locations of examinations.

**History of Goal Achievement/Revision:**

The RDA Practical Examination was expanded in 1994 from two to three examinations cycles annually, held on approximately 40 days per year. To have even more frequent examinations would require considerably more funding, and would be difficult logistically due to the already-tight schedule between the end of one cycle and the open filing period of the next.

COMDA completed its goal of analyzing the feasibility of computerizing the RDA written examination, and is now seeking funding during FY00-01 to accomplish this task beginning with the Fall, 2000, examinations, which will allow candidates to take the examination at their convenience during each exam cycle.

Difficulties during the last few years in securing facilities in the dental schools caused COMDA to seek other facilities in November, 1998, which allowed more candidates to be tested at one time, and therefore results and licenses to be issued sooner than was true in the past. Until the final content of the examination is determined, it is not possible to determine whether the examination can be administered more frequently than three times per year.

The RDH Examination Subcommittee began considering in 1999 whether increasing numbers of candidates and fluctuating graduation dates would justify the expense of adding a third examination to the two cycles that have historically been administered. The locations of exams are limited due to the need to hold them in dental schools. In late 1999, COMDA approved the addition of needed examination dates; one additional day of exams will be administered in June in order to reduce the overwhelming number of candidates per session which has begun to occur during the Southern July exams.

The EF examination is given twice yearly, with a directive from the Board that the second examination can only be held if there are 10 or more applicants. At this point, there are no plans by the EF Examination Subcommittee to recommend that a third examination cycle be considered, since only 22 candidates were examined in May, 1999, and 85 in December, 1999 (compared to 29 in May, 1998, and 74 in December, 1998).

Decisions about increasing the frequency of any of the examinations will be impacted by the need for weekend examination dates, in order to secure facilities and examiners, and in response to candidate preferences (from 96% to 98% prefer weekends)

**Action Plan to Continue Goal Achievement:**

- a. By December 31, 2001, analyze the feasibility of administering computer adaptive testing for the RDA written examination.
- b. By March 31, 2002, analyze collected data, make appropriate process revisions, and make appropriate recommendations to the Dental Board of California if regulatory or statutory changes are necessary to implement continuous testing and/or computer adaptive testing for the RDA written examination.

c. By December 31, 2002, implement appropriate computer adaptive systems for the RDA written examination.

<b>Objective #4: Assure that the examinations are valid, relevant, and reliable, by December 31, 2001.</b>
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**Performance Measure(s):**

a. Analysis completed and action taken to effect any necessary changes to increase the validity, relevance, and reliability of the examinations.

**Indicator(s) of Goal Achievement:**

a. Consensus among regulators, licensees, applicants, and other stakeholders that the examinations are valid, relevant, and reliable.

**History of Goal Achievement/Revision:**

An Occupational Analysis of RDA-s was conducted in 1993, and the results analyzed in 1994 and 1995 to assess the relevance of the RDA examinations, and determine whether RDA-s should be allowed to perform additional duties. In 1998, COMDA recommended that the RDA Practical Exam be eliminated, which resulted in a November, 1998, directive from the Board that the exam be revised to increase its validity, among other changes. During 2000, COMDA will be finalizing its recommendations on the implementation of these changes and report to the Board.

In 1995, COMDA recommended, and the Board successfully pursued, a regulatory change to eliminate the endodontic portion of the EF examination, which resulted in higher examination relevance because surveys showed that this duty was rarely performed in practice. In late 1998, COMDA recommended, and the Board successfully pursued, a regulatory changes to the EF examination requirements to more clearly define patient acceptability for exam candidates.

In 1998, COMDA also recommended, and the Board successfully pursued, a regulatory change to allow RDH candidates to use ultrasonic devices for scaling during the RDH clinical examination, which more accurately reflects methods used in practice.

In late 1999, COMDA and the Board approved the RDH Examination Subcommittee's recommendation that the clinical exam grading system be revised to assure that candidates presenting patients with heavy calculus are not unnecessarily penalized compared to those that present patients with light calculus. This change will be implemented during the Summer, 2000, examinations.

An occupational analysis of RDH-s and EF-s was completed in 1998, which is being used by the Department-s Office of Examination Resources to assess the validity, relevance, and reliability of the RDH and EF examinations, which should be reported to COMDA by the end of calendar year 2000.

COMDA's RDHAP Examination Subcommittee began development of a written examination for the new RDHAP category of licensure. Its recommended written outline, on which exam questions will be based, was approved by COMDA and the Board in late 1999, and it is anticipated that the first examination will be constructed by July 31, 2000.

**Action Plan to Continue Goal Achievement:**

- a. By December 31, 2000, complete validation of the RDH and EF examinations based on the past occupational analyses, and make appropriate recommendations to the Board concerning needed resulting changes to the examinations.
- b. By March 31, 2000, provide the Board with a final report on implementing changes to the RDA practical examination.
- c. By June 30, 2001, complete an occupational analysis of RDA practitioners, and make appropriate recommendations to the Board concerning needed resulting changes to the examinations.
- d. By December 31, 2000, obtain Board approval of the RDHAP written examination.

**Objective #5: Assure that the manner in which practical/clinical examiners are trained, calibrated, and evaluated are efficient and assure at least the minimum competence of applicants, by June 30, 2002.**

**Performance Measure(s):**

- a. Analysis completed and action taken to effect any necessary changes to assure examination calibration.

**Indicator(s) of Goal Achievement:**

- a. Statistics reflect an increased level of calibration among examiners.

**History of Goal Achievement/Revision:**

The training, calibration, and evaluation of examiners has been an ongoing process, to which significant resources have been consistently devoted.

Statistics show that RDA practical examiners consistently calibrate at an average of 98%. Informal RDH examiner statistics show an average calibration level of from 70-80%, depending on the factors being evaluated.

The RDH Examination Subcommittee has been evaluating the best methods of assessing examiner calibration over the last three years, and intends to continue to do so in 2000. Three years ago, an annual one-day instrumentation training system was instituted, which examiners must attend every two years (each year, voluntarily), with the exception of the year 2000, in order to continue as an examiner. The Subcommittee has also been exploring the use of third examiners, but has not been able to thoroughly evaluate the impact on the exam because of the large impact testing this sort of change during an actual examination has had on the examination process.

The EF Subcommittee is devising a finalized system of assessing examiner calibration. In 1999, a revised system for training EF examiners was initiated, and will be refined during 2000.

**Action Plan to Continue Goal Achievement:**

- a. By December 31, 2000, survey examiners to determine their perspectives.
- b. By June 30, 2001, analyze internal processes to determine methods to assure optimal training, calibration, and evaluation of examiners.
- c. By March 31, 2002, analyze collected data, make appropriate process revisions, and make

appropriate recommendations to the Dental Board of California if regulatory or statutory changes are necessary.

**Objective #6: Assure that the practical and clinical examination processes are secure, efficient, and the least stressful to all parties as possible, by December 31, 2000.**

**Performance Measure(s):**

a. Analysis completed and action taken to effect any necessary changes to increase the security and efficiency of the examinations, and reduce unnecessary stress to all participants.

**Indicator(s) of Goal Achievement:**

a. Consensus among regulators, licensees, applicants, and other stakeholders that the examinations are secure, efficient, and the least stressful possible.

**History of Goal Achievement/Revision:**

Candidates began to be surveyed in early 1997-98 as to their satisfaction with the efficiency and stress levels of the examinations. From 92% to 97% indicated they felt the exam process was efficient, and 94% to 100% indicated that exam personnel had been courteous. However, only from 60% to 77% indicated the exam was not unnecessarily stressful. Thus far, staff can only attribute these results to the fact that an examination is inherently stressful, for lack of any other data.

Efficiency of the examination processes has been a high priority for staff, and many changes have been implemented in the last two years, such as:

- a. RDA Written Exam - Began efforts to transfer to a shorter computerized exam, whereby candidates will be allowed to take the exam at their convenience and take less time to complete.
- b. RDA Practical Exam - All four procedures now tested at once, candidate written on-site instructions revised and expanded, gradesheet paperwork reduced, removal of prepared teeth by examinees rather than proctors, began soliciting additional examiners to shorten grading time
- c. RDH Clinical Exam - Regulations amended to allow COMDA to require that candidates provide more than one explorer, on-site written instructions to candidates, significantly reduced candidate orientation period, changed the grading system to expand the available patient pool, began soliciting additional examiners and recorders to shorten grading time
- d. EF Clinical Exam - On-site written instructions to candidates, revised gradesheets, increased efficiency in patient flow, began considering adding additional floor examiners for check in

**Action Plan to Continue Goal Achievement:**

- a. By June 30, 2000, analyze internal processes to determine methods by which to assure exam administration security, efficiency, and user-friendliness.
- b. By September 30, 2000, analyze collected data, make appropriate process revisions, and make appropriate recommendations to the Dental Board of California if regulatory or statutory changes are necessary.



**Objective #7: Assure that the application, examination, renewal, and other fees for each license category reflect only the costs incurred in by the applicable program, by June 30, 2001.**

**Performance Measure(s)/Indicator of Goal Achievement:**

a. Analysis completed and action taken to effect any necessary changes to application, examination, renewal, and other fees.

**History of Goal Achievement/Revision:**

In 1997, COMDA conducted a fee analysis which resulted in a reduction of the renewal fee for all licensees from \$30 to \$20 in April, 1998.

In late 1999, it was determined that increased program costs and a previous directive from the Legislature to decrease COMDA's fund reserve would cause a deficit fund in FY02-03. As a result, COMDA recommended and the Board adopted a resolution increasing the 2-year renewal fee from \$20 to \$35 effective April 1, 2000.

**Action Plan to Continue Goal Achievement:**

a. By December 31, 2000, analyze the costs of administration of each program during the prior two years.

b. By June 30, 2001, make appropriate recommendations to the Dental Board of California if fee adjustments are necessary.

**Objective #8. Assure that renewal requirements are appropriate, easy to understand, and communicated in a timely manner, and that required forms are simple to complete and file, by December 31, 2001.**

**Performance Measure(s):**

a. Analysis completed and action taken to effect any necessary changes to application, examination, renewal, and other fees.

**Indicator of Goal Achievement:**

a. Consensus among regulators, licensees, and other stakeholders that the renewal requirements are appropriate, easy to understand, and communicated in a timely manner, and that required forms are simple to complete and file.

**History of Goal Achievement/Revision:**

Currently, renewal notices are issued about 45 days prior to actual license expiration. In late 1999, renewal forms were significantly modified to eliminate any unnecessary information and make them easier to understand.

**Action Plan to Continue Goal Achievement:**

a. By December 31, 2000, survey licensees and other interested parties to determine their

perspectives.

- b. By June 30, 2001, analyze internal processes to determine what methods can be used to clearly communicate renewal requirements to licensees.
- c. By September 30, 2001, analyze collected data, make appropriate process revisions, and make appropriate recommendations to the Dental Board of California if regulatory or statutory changes are necessary
- d. By December 31, 2001, implement a system whereby licensees can renew and update information electronically.

**Goal #3:**

**ASSIST THE BOARD IN ITS CONSUMER PROTECTION AND ENFORCEMENT EFFORTS.**

**Objective #1. Develop and distribute bi-annual newsletters and a revised Handbook to licensees, so that they remain fully informed of the laws and regulations which govern them, by December 31, 2000.**

**Performance Measure(s):**

- a. The first newsletter is distributed by June 30, 1999.

**Indicator(s) of Goal Achievement:**

- a. Licensees believe that they are better informed of the laws, regulations, and policies which govern them as a result of receiving the Newsletter.

**History of Goal Achievement/Revision:**

In September, 1998, the previous primary objective of issuing a Handbook of laws and regulations affecting auxiliaries was realized, with plans to reprint every two years.

Since the Handbook was not published until September, and due to budget constraints, a new Objective of issuing the first Newsletter by June 30, 1999, instead of December 31, 1998, has been established. Instead, COMDA worked with Board staff to issue a joint newsletter to all licensees twice each year, with the first one published in October, 1999.

COMDA is also seeking funding to issue an up-to-date version of the Handbook during FY00-01.

**Action Plan to Continue Goal Achievement:**

- a. Between July 1, 1999, and June 30, 2000, issue two Newsletters to all licensees.
- b. By December 31, 2000, distribute a revised edition of the Handbook.

**Objective #2. Explore the feasibility of hiring enforcement personnel dedicated to auxiliary enforcement priorities to assist the Board in its consumer protection efforts, by June 30, 2001.**

**Performance Measure(s):**

- a. Analysis completed and action taken to effect any necessary hiring of enforcement personnel.

**Indicator(s) of Goal Achievement:**

- a. Increased enforcement of the laws with regard to auxiliaries.

**History of Goal Achievement/Revision:**

In 1998, COMDA recommended to the Board that it consider evaluating whether enforcement personnel should be hired and dedicated to auxiliary enforcement issues, funded by COMDA. The Board took the recommendation under advisement. During 1998 and 1999, the Board successfully pursued legislation to retain most of its investigative personnel.

**Action Plan to Continue Goal Achievement:**

- a. By December 31, 2000, recommend to the Board that it consider evaluating whether enforcement personnel should be hired and dedicated to auxiliary enforcement issues, funded by COMDA, if the Board has not already made a decision as to the feasibility and necessity of such action in view of past legislative action to eliminate its investigators.

**Goal #4**

**FOSTER THE ACCESSIBILITY OF DENTAL HEALTH CARE BY SUPPORTING  
SCOPES OF PRACTICE AND SUPERVISION LEVELS WHICH ALLOW THE MOST  
EFFECTIVE UTILIZATION OF DENTAL AUXILIARIES.**

**Objective #1. Assure that the duties that each license category is allowed to perform, the level of supervision required, and the allowed settings, provide for the most effective utilization of auxiliaries, by June 30, 2002.**

**Performance Measure(s):**

- a. Analysis completed and action taken to effect any necessary changes to the duties, supervision levels, and/or allowed settings of auxiliaries.

**Indicator(s) of Goal Achievement:**

- a. Consensus among regulators, licensees, and other stakeholders that the duties, supervision levels, and/or allowed settings of auxiliaries provide for the most effective utilization of auxiliaries.

**History of Goal Achievement/Revision:**

In 1993-95, an occupational analysis of RDA's was performed and analyzed, which resulted in the addition of the taking of bite registrations and the use of light-curing devices as allowable duties. In response to other issues brought to it, COMDA also recommended, and the Board successfully pursued, regulatory changes to allow RDA's to apply bleaching agents and activate bleaching agents with a light-curing device, and to fabricate temporary crowns intra-orally.

An occupational analysis of RDH's and EF's was completed in 1999, to determine the appropriateness of duties and supervision levels.

As a result, COMDA recommended to the Board that EF's be allowed to perform several additional duties, including the removal of excess cement subgingivally, the application of etchant for bonding restorative materials, and the placement of amalgam and composite fillings, under direct supervision. The Board accepted COMDA's recommendations regarding removal of excess cement and bonding, but rejected its recommendations regarding amalgam and composite fillings.

COMDA also recommended that the Board allow RDH's to subgingivally place medicaments which do not later have to be removed, which the Board rejected. The Board began pursuing a regulatory change to allow RDH's to place antimicrobial and/or antibiotic liquid solutions subgingivally.

**Action Plan to Continue Goal Achievement:**

- a. By June 30, 2001, complete an occupational analysis of RDA practitioners, and related surveys of employers, educators and others, to obtain their perspectives.
- b. By December 31, 2001, hold a public hearing to gain additional testimony
- c. By June 30, 2002, make appropriate recommendations to the Board.

**Goal #5**

**FOSTER THE ACCESSIBILITY OF DENTAL HEALTH CARE BY SUPPORTING AND  
ADVOCATING THE EXISTENCE OF AN ACCESSIBLE AND VIABLE CAREER  
LADDER WHICH ALLOWS THE MOST EFFECTIVE UTILIZATION OF  
DENTAL AUXILIARIES.**

**Objective #1. Assure that an accessible and viable career ladder exists among all categories of auxiliaries, by December 31, 2001.**

**Performance Measure(s):**

- a. Analysis completed and action taken to effect any necessary changes to assure the existence of an accessible and viable career ladder among all categories of auxiliaries.

**Indicator of Goal Achievement:**

- a. Consensus among regulators, licensees, and other stakeholders that an accessible and viable career ladder among all categories of auxiliaries exists.

**History of Goal Achievement/Revision:**

In 1998, COMDA determined that a form of career ladder exists, and has for some time, and that the only obstacle to the existence of a career ladder among all categories of dental health professionals rested with the educational institutions and their recognition of past coursework.

COMDA appointed a Subcommittee to contact and work with the various educational institutions to determine whether and/or how a career ladder among all categories can be achieved.

**Action Plan to Continue Goal Achievement:**

- a. By December 31, 2001, make appropriate recommendations to the Board regarding action that might be taken to urge or ensure that educational programs recognize prior coursework and/or take other steps to ensure the existence of a career ladder among all categories of dental health professionals.

**Goal #6**

**SUPPORT EFFORTS TO EDUCATE CONSUMERS IN ORDER TO IMPROVE THEIR DENTAL HEALTH.**

**Objective #1: Add consumer information to COMDA's web site, by June 30, 2001.**

**Performance Measure(s):**

- a. Consumer information has been added to the web site by June 30, 1999.

**Indicator of Goal Achievement:**

- a. Consumer feedback regarding the site indicates that the information is valuable.

**History of Goal Achievement/Revision:**

In 1998, COMDA completed its previous Objective of asking the Board how it could help the Board in its consumer education efforts, including the addition of consumer information to COMDA's website. The Board did not provide any feedback on the ways in which COMDA could provide such assistance.

COMDA determined during 1999 that it had placed as much consumer information on its website as possible without further direction from the Board.

**Action Plan to Continue Goal Achievement:**

- a. By June 30, 2001, solicit feedback from the Board on whether any additional information should be added to COMDA's website to assist consumers.

**Goal #7**

**DEVELOP AND MAINTAIN THE MOST FLEXIBLE, RESPONSIVE, AND COST-EFFECTIVE ORGANIZATIONAL STRUCTURE POSSIBLE.**

**Objective #1: Increase and update program automation to improve customer service, by June 30, 2001.**

**Performance Measure(s):**

- a. Program automation has been increased and updated to improve customer service.

**Indicator of Goal Achievement:**

- a. Customers indicate that service has improved due to an increase in and/or updating of program automation.

**History of Goal Achievement/Revision:**

COMDA established a plan for Y2K compliance by June 30, 1999, and transitioned to the Year 2000 with no known problems. This included transition of the radiation safety certificate database to a Y2K compliant database. COMDA also developed a comprehensive Business Continuity Plan to be used for recovery in the event of a disaster.

In 1998, COMDA deployed a website and completed its connection to the Howe Avenue Lan, and Department of Consumer Affairs network. During 1999, the website was continually expanded and updated, and received increasing hits over time.

An automated telephone system was installed in mid-1997, but has not yet been programmed and/or retrofitted to retrieve such statistics as busy signals, hold times, etc.

In 1999, contact was made with the DCA regarding the legislatively mandated inclusion of auxiliary licensees in DCA's licensee "look-up" project, which had been overlooked when other mandated licensees were added. This function allows the public to check on the status of a

license on the internet. In February, 2000, DCA began efforts to work with COMDA to add auxiliary licensees to this service.

**Action Plan to Continue Goal Achievement:**

- a. By December 31, 2000, install and monitor a telephone system that will track busy signals, hold times, and other indicators to determine if additional resources are needed to improve telephone customer service.
- b. By June 30, 2000, allow consumers to access licensee information via the internet.
- c. By December 31, 2000, evaluate the benefits of utilizing an 800 number to provide more accessible communication.
- d. By December 31, 2000, integrate the radiation safety certificate database with the CAS system, so that this "license" information is a part of the primary license database, and the public can access such information on the internet.
- e. By June 30, 2001, revise the website to allow licensees to renew their licenses, and update information, via the website, and allow applicants to file for licensure via the website.

<b><u>Objective #2.</u> Assure that all processes provide maximum customer service by December 31, 2001.</b>
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**Performance Measure(s):**

- a. Customers are receiving more timely, effective, courteous service.

**Indicator of Goal Achievement:**

- a. Customers indicate that customer service has improved.

**History of Goal Achievement/Revision:**

COMDA staff have been provided with copies of COMDA's Strategic Plan. In January, 1999, it was decided to eliminate the goal of conducting a business practice study of COMDA's operations, as this is continuously done by COMDA members and staff. During 1999, staff attended several training classes on improved customer service.

**Action Plan to Continue Goal Achievement:**

- a. By June 30, 2000, develop a strategy to ensure that staff is aware of and committed to the Plan.
- b. By December 31, 2000, conduct an assessment of staff training needs in the area of quality customer service and devise a training schedule to correct any deficiencies.
- c. By June 30, 2001, develop a system to periodically assess customer satisfaction with all services provided.

<b><u>Objective #3:</u> Assure that the written policies and procedures for all personnel, computer, and system processes are current and thorough, by December 31, 2001.</b>
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**Performance Measure(s):**

a. Current written policies and procedures exist for all personnel, computer, and system processes.

**Indicator(s) of Goal Achievement:**

a. Current written policies and procedures have been prepared for personnel, computer, and/or system processes.

**History of Goal Achievement/Revision:**

Written procedure manuals now exist for all examination, licensing, and cashiering functions, and RDA educational program approval, and personnel, procurement and other administrative operational functions.

**Action Plan to Continue Goal Achievement:**

a. By December 31, 2001, assure that the written policies and procedures for all examination, licensing, cashiering functions, and RDA educational program functions, and all personnel, procurement and other administrative operational functions, are current and thorough.

<b>MONITORING AND TRACKING</b>
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Monitoring and tracking the achievement of goals will be performed through an annual review by COMDA of progress toward the achievement of the stated Goals and Objectives.

<b>RESOURCE ASSUMPTIONS</b>
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COMDA intends to achieve the majority of its goals within existing resources, by continuing to identify and implement program efficiencies as it has done during the last four years.

However, it will be necessary to receive an augmentation of funds periodically to conduct occupational analysis and related examination validity studies, to increase the frequency of examinations, and to implement sophisticated computer systems to allow applicants and licensees to electronically access and update their files.



**TABLE OF SCHEDULED ACTION PLAN DATES**

<b>ACTION</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>
<b>Goal #1 SUPPORT THE IMPOSITION OF THE LEAST RESTRICTIVE FORM OF REGULATION NECESSARY WITHOUT COMPROMISING THE HEALTH, SAFETY, OR WELFARE OF THE PUBLIC.</b>					
<b>Objective #1: Assure that the educational, experience, and examination requirements for each license category are necessary and, if so, appropriate in content and length.</b>		6/30			
a. Survey applicable employers, educators, practitioners, applicants, professional groups, other state regulatory agencies, and consumers to determine their perspectives.	6/30				
<b>Objective #2: Assure that the mechanisms to ensure that new and previously-approved educational programs meet the requirements for initial or continued approval are necessary and adequate to protect the public.</b>		6/30			
a. Re-submit regulations to OAL for RDA educational programs.	12/31				
b. Survey educators, graduates, professional groups, and other state regulatory agencies to determine their perspectives.	12/31				
c. Hold a public hearing to solicit additional testimony.		6/30			
d. Analyze collected data and make appropriate recommendations to the Dental Board of California.		12/31			
<b>Objective #3. Assure that the continuing education requirement is the most appropriate mechanism to ensure continued competency.</b>					6/30
a. Survey applicable employers, educators, practitioners, applicants, professional groups, other state regulatory agencies, and consumers to determine their perspectives.			6/30		

b. Complete research on alternative modes of assuring continued competence and hold a public hearing to solicit additional testimony.				6/30	
c. Analyze collected data and make appropriate recommendations to the Dental Board of California.				12/31	
<b>ACTION</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>
<b>Objective #4. Conduct a formal review of laws and regulations to ensure they are not unduly restrictive, or present artificial barriers, and that they continue to protect consumers.</b>			6/30		
a. Survey employers, educators, applicants, practitioners, professional groups, and other state regulatory agencies to determine their perspectives.	12/31				
b. Hold a public hearing to solicit additional testimony.		6/30			
c. Analyze collected data and make appropriate recommendations to the Dental Board of California.		12/31			
<b><u>Goal #2: ADMINISTER ACCESSIBLE, FAIR, AND VALID EXAMINATION AND LICENSING PROCESSES.</u></b>					
<b>Objective #1: Assure that the application forms require only information and documents legally required, and are easy to understand, complete, and file.</b>	12/31				
a. Analyze the number of applications which were rejected as incomplete during 1999.	3/31				
b. Analyze collected data, make appropriate process revisions, and make appropriate recommendations to the Dental Board of California if regulatory or statutory changes are necessary.	9/30				
c. Implement a system whereby applicants can file applicants electronically.		12/31			
<b>Objective #2: Assure that the length of filing periods and processing periods assure the most timely access by applicants to licensure as possible.</b>	12/31				
a. Analyze internal processes to determine methods by which the time periods can be reduced.	6/30				

b. Analyze collected data, make appropriate process revisions, and make appropriate recommendations to the Dental Board of California if regulatory or statutory changes are necessary.	9/30				
<b>ACTION</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>
<b>Objective #3: Assure that the dates and locations of exams provide the most timely access by applicants possible.</b>			12/31		
a. Analyze the feasibility of offering continuous testing and/or computer adaptive testing for the RDA written exam.		12/31			
b. Analyze collected data, make appropriate process revisions, and make appropriate recommendations to the Dental Board of California if regulatory or statutory changes are necessary regarding the RDA written exam			3/31		
d. Implement appropriate computer adaptive systems regarding the RDA written exam.			12/31		
<b>Objective #4: Assure that the examinations are valid, relevant, and reliable.</b>		12/31			
a. Complete an occupational analysis of RDH and EF practitioners, and make appropriate recommendations to the Board concerning needed resulting changes to the examinations.	12/31				
b. Provide the Board with a final report on implementing changes to the RDA practical exam	3/31				
c. Complete an occupational analysis of RDA practitioners, and make appropriate recommendations to the Board concerning needed resulting changes to the examinations.		6/30			
d. Obtain Board approval of the RDHAP written exam.	12/31				
<b>Objective #5: Assure that the manner in which practical/clinical examiners are trained, calibrated, and evaluated are efficient and assure the minimum competence of applicants.</b>			6/30		
a. Survey examiners to determine their perspectives.	12/31				
b. Analyze internal processes to determine methods to assure optimal training, calibration, and evaluation of examiners.		6/30			

c. Analyze collected data, make appropriate process revisions, and make appropriate recommendations to the Dental Board of California if regulatory or statutory changes are necessary.			3/31		
<b>ACTION</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>
<b>Objective #6: Assure that the practical/clinical examination processes are secure, efficient, and the least stressful to all parties as possible.</b>	12/31				
a. Analyze internal processes to determine methods by which to assure exam administration security, efficiency, and user-friendliness.	6/30				
b. Analyze collected data, make appropriate process revisions, and make appropriate recommendations to the Dental Board of California if regulatory or statutory changes are necessary.	9/30				
<b>Objective #7: Assure that the application, examination, renewal, and other fees for each license category reflect only the costs incurred in by the applicable program.</b>		6/30			
a. Analyze the costs of administration of each program during the prior two years.	12/31				
b. Make appropriate recommendations to the Dental Board of California if fee adjustments are necessary		6/30			
<b>Objective #8. Assure that renewal requirements are appropriate, easy to understand, and communicated in a timely manner, and that required forms are simple to complete and file.</b>		12/31			
a. Survey licensees and other interested parties to determine their perspectives.	12/31				
b. Analyze internal processes to determine what methods can be used to clearly communicate renewal requirements to licensees.		6/30			
c. Analyze collected data, make appropriate process revisions, and make appropriate recommendations to the Dental Board of California if regulatory or statutory changes are necessary.		9/30			
d. Implement a system whereby licensees can renew and update information electronically.		12/31			

<b>Goal #3: ASSIST THE BOARD IN ITS CONSUMER PROTECTION AND ENFORCEMENT EFFORTS.</b>					
Objective #1. Develop and distribute bi-annual newsletters and a revised Handbook to licensees, so that they remain fully informed of the laws and regulations which govern them.	12/31				
<b>ACTION</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>
b. Issue two newsletters in FY99-00	6/30				
c. Distribute a revised Handbook	12/31				
Objective #2. Explore the feasibility of hiring enforcement personnel dedicated to auxiliary enforcement priorities to assist the Board in its consumer protection efforts.		6/30			
a. Recommend to the Board that it consider hiring enforcement personnel dedicated to auxiliary enforcement issues	12/31				
<b>Goal #4: FOSTER THE ACCESSIBILITY OF DENTAL HEALTH CARE BY SUPPORTING SCOPES OF PRACTICE AND SUPERVISION LEVELS WHICH ALLOW THE MOST EFFECTIVE UTILIZATION OF DENTAL AUXILIARIES.</b>					
Objective #1. Assure that the duties that each license category is allowed to perform, the level of supervision required, and the allowed settings, provide for the most effective utilization of auxiliaries.			6/30		
a. Complete an occupational analysis of RDA practitioners, and related surveys of employers, educators and others, to obtain their perspectives.		6/30			
b. Hold a public hearing to gain additional testimony		12/31			
c. Make appropriate recommendations to the Board.			6/30		
<b>Goal #5: FOSTER THE ACCESSIBILITY OF DENTAL HEALTH CARE BY SUPPORTING AND ADVOCATING THE EXISTENCE OF AN ACCESSIBLE AND VIABLE CAREER LADDER WHICH ALLOWS THE MOST EFFECTIVE UTILIZATION OF DENTAL AUXILIARIES.</b>					
Objective #1. Assure that an accessible and viable career ladder exists among all categories of auxiliaries.		12/31			

a. Make appropriate recommendations to the Board to ensure that educational programs take steps to ensure a career ladder among all categories of dental health professionals.		12/31			
<b>ACTION</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>
<b>Goal #6 SUPPORT EFFORTS TO EDUCATE CONSUMERS IN ORDER TO IMPROVE THEIR DENTAL HEALTH.</b>					
<b>Objective #1: Add consumer information to COMDA's website.</b>		6/30			
a. Solicit feedback from the Board on whether any additional information should be added to COMDA's website to assist consumers.		6/30			
<b>Goal #7 DEVELOP AND MAINTAIN THE MOST FLEXIBLE, RESPONSIVE, AND COST-EFFECTIVE ORGANIZATIONAL STRUCTURE POSSIBLE.</b>					
<b>Objective #1: Increase and update program automation to improve customer service.</b>		6/30			
a. Install and monitor a telephone system that will track busy signals, hold times, and other indicators to determine if additional resources are needed to improve telephone customer service.	12/31				
b. Allow consumers to access licensee information via the internet	6/30				
b. Evaluate the benefits of utilizing an 800 number to provide more accessible communication.	12/31				
c. Integrate the radiation safety database with CAS, so that all license information is available to the public on the internet.	12/31				
d. Revise the website to allow licensees to renew their licenses, and update information, via the website, and allow applicants to file for licensure via the website.		6/30			
<b>Objective #2. Assure that all processes provide maximum customer service.</b>		12/31			
a. Develop a strategy to ensure that staff are aware of and committed to the Plan.	6/30				
b. Conduct an assessment of staff training needs in the area of quality customer service and devise a training schedule to correct any deficiencies.	12/31				

c. Develop a system to periodically assess customer satisfaction with all services provided.		6/30			
<b>ACTION</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>
<b>Objective #3: Assure that written policies and procedures for all personnel, computer, and system processes are current and thorough.</b>		12/31			
a. Assure that written policies and procedures for all examination, licensing, cashiering functions, and RDA educational programs, and personnel, procurement and other administrative operational functions are current and thorough.		12/31			

